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6 Attorneys for the United States of America

7 IN THE UNITED STATES DISTRICT COURT

8 FOR THE TERRITORY OF GUAM

9 UNITED STATES OF AMERICA,

10 Plaintiff,

11 vs.

12 RICKY JAMES JR. SALAS SANTOS,

13 Defendant.  
14  
15  
16

CRIMINAL CASE NO. 20-00021

**UNITED STATES' MOTION FOR  
EXTENSION OF TIME TO PROVIDE  
DISCOVERY**

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18 The United States hereby moves for a two (2) week extension of time to comply with its  
19 discovery obligations pursuant to Criminal Local Rule 16 of the Criminal Local Rules of Practice  
20 and Rule 16 of the Federal Rules of Criminal Procedure, and in support states as follows:

21 1. Defendant was arraigned on September 10, 2020. At arraignment, the Court ordered  
22 the Government to provide discovery to the Defendant by September 17, 2020. ECF 10. In  
23 compliance with the Court's September 10, 2020 Order (ECF 10), the Government provided 315  
24 pages of discovery to defense counsel on September 11, 2020. The United States has additional

1 discovery to produce in this case and has been working diligently to extract and process this  
2 discovery for production in a readily reviewable and searchable electronic format.

3 2. On September 3, 2020, the Magistrate Judge issued search warrants for the Defendant's  
4 three electronic devices (MJ 20-00095, MJ 20-00096 and MJ 20-00097). The extraction of  
5 information from the three electronic devices is ongoing, however this endeavor is a time  
6 consuming process. The Government requests for an extension of time for good cause as the  
7 Government is unable to produce the results of the electronic device extractions in accordance  
8 with the Court's September 10, 2020 Order.

9 3. It is the United States' intention to provide additional discovery to the defendant  
10 within two weeks after the September 17, 2020 deadline, or on or before October 1, 2020.

11 For the reasons set forth above, the United States requests that this Court extend the  
12 deadline for the production of the United States' discovery for at least two (2) weeks.

13 RESPECTFULLY SUBMITTED on September 12, 2020.

14 SHAWN N. ANDERSON  
15 United States Attorney

16 By: /s/ Rosetta L. San Nicolas  
17 ROSETTA L. SAN NICOLAS  
18 Assistant U.S. Attorney  
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